

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Joel Schneider,
Magistrate Judge

**NOTICE OF MANUFACTURER
DEFENDANTS' MOTION TO
DISMISS**

TO: Adam M. Slater, Esq.
Plaintiffs' Liaison Counsel
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PLEASE TAKE NOTICE that on November 2, 2020, or a date to be determined by the Court after October 16, 2020, Arrow Pharm Malta Ltd., Aurobindo Pharma, Ltd., Aurolife Pharma, LLC, Hetero Drugs, Limited, Hetero Labs, Ltd., Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Teva Pharmaceuticals Industries Ltd., Torrent Pharmaceuticals Ltd., and Zhejiang Huahai Pharmaceutical Co., Ltd. (collectively, "Manufacturing Defendants"), and Aurobindo Pharma USA, Inc., Hetero USA, Inc., and Princeton Pharmaceutical Inc. (collectively, "FDA Liaison Defendants"), by and through lead counsel for all

Defendants in the above-captioned action, Duane Morris LLP, Greenberg Traurig, and Pietragallo Gordon Alfano Bosick & Raspanti, LLP, shall move before the Honorable Robert B. Kugler, United States District Judge of the United States District Court for the District of New Jersey, for entry of an Order dismissing the Master Personal Injury Complaint (ECF No. 122), the Consolidated Second Amended Economic Class Action Complaint (ECF No. 398), and the Consolidated Amended Medical Monitoring Class Action Complaint (ECF No. 123) pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Manufacturing Defendants and FDA Liaison Defendants shall rely on the accompanying Memorandum of Law (and the Compendiums of Charts and Unpublished and Unreported Authorities appended thereto) and all papers later submitted with Manufacturing Defendants and FDA Liaison Defendants' reply in further support of their motion to dismiss.

PLEASE TAKE FURTHER NOTICE that, for the Court's convenience, two proposed forms of Order are submitted herewith, one proposing the dismissal of the Complaints in full and one proposing the dismissal of the Complaints in part.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys for Defendants request oral argument on this motion.

Respectfully submitted,

/s/ Seth A. Goldberg

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Dated: July 17, 2020